

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JEROME K. HAMILTON, a/k/a  
ELOHIM CHEIKH AHMED,

Plaintiff,

v.

CATHY L. GUESSFORD, REBECCA  
MCBRIDE, ROBERT F. SNYDER, THOMAS  
L. CARROLL, and STANLEY W. TAYLOR,  
JR.

Defendants

C.A. No. 04-1422 (GMS)

JURY TRIAL DEMANDED

**NOTICE OF RECORDS DEPOSITION DUCES TECUM\***

TO: Prison Health Services, Inc.  
c/o The Corporation Trust Company  
Corporation Trust Center  
1209 Orange Street  
Wilmington, DE 19801

**PLEASE TAKE NOTICE** that the undersigned attorney will take the deposition of the Records Custodian of Prison Health Services, Inc., on Thursday, April 26, 2007, at 10:00 a.m. at the offices of Aber, Goldlust, Baker & Over located at Suite 600, First Federal Plaza, Wilmington, DE 19801. Pursuant to Rule 30(b)(6) the deponent is to designate an individual knowledgeable with the documents listed on Exhibits Nos. 1 and 2 attached.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber

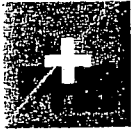
GARY W. ABER (DSB #754)  
702 King Street, Suite 600  
P.O. Box 1675  
Wilmington, DE 19899  
302-472-4900  
Attorney for Plaintiff

DATED: April 16, 2007

**\*The deponent is to produce all documents referred to or mentioned in Exhibit No. 1. A subpoena has been issued to the deponent for this deposition.**

**EXHIBIT NO. 1**

1. All documents referring to a former inmate of the Delaware Department of Corrections, Jerome Hamilton.
2. All documents referring to a former inmate of the Delaware Department of Corrections, Cheikh Ahmed Elohim.
3. All documents reflected in, or mentioned in a memorandum from Prison Health Services, Inc., to the Delaware Department Inmate Grievance Chair, dated March 29, 2000 attached hereto as Exhibit No. 2.



## Prison Health Services, Inc.

TO: Inmate Grievance Chair  
FROM: Daphne Carroll, M.C. *DC*  
Mental Health Site Supervisor  
DATE: March 29, 2000  
RE: Inmate Grievance No. Med0003024

This department is very familiar with the inmate Jerome Hamilton and he has been receiving services from this department for many years. Following are the dates that reflect our contacts and the nature of the contacts over the past year.

3/15/00	medications changed
3/14/00	therapist contact
2/29/00	therapist contact
2/16/00	psychiatric contact
2/11/00	therapist contact
1/19/00	psychiatric contact
1/7/00	therapist contact
12/10/99	therapist contact
12/8/99	psychiatrist contact
11/29/99	therapist contact
10/28/99	therapist contact
10/27/99	psychiatrist contact
10/8/99	therapist contact
8/31/99	interviewed for group participation - inmate declined
8/11/99	completed individual sessions with therapist Crowley
8/10/99	psychiatrist contact
1/99 to 8/99	individual therapy with therapist Crowley

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the attached pleading was filed via electronic filing on April 16, 2007 and was served on the following counsel:

Eileen Kelly, Esquire  
Department of Justice  
820 N. French Street, 6th Floor  
Wilmington, DE 19801

/s/ Melissa A. Chionchio  
Melissa A. Chionchio  
Secretary to Gary W. Aber, Esquire